

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

This document relates to:

City of Portageville v. Ashland Inc., et al.,
No. 13-CV-07299

Master File No. 1:00 – 1898
MDL 1358 (SAS): M21-88

Town of Brewster, et al. v. Atlantic Richfield Co., et al., No. 13-CV-07247 (SAS)

**CORPORATE DISCLOSURE STATEMENT OF
DEFENDANT EL PASO MERCHANT ENERGY-PETROLEUM COMPANY**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, El Paso Merchant Energy-Petroleum Company submits the following Corporate Disclosure Statement:

A. El Paso Merchant Energy-Petroleum Company

El Paso Merchant Energy-Petroleum Company is 100% owned by its parent corporation, El Paso CGP Company, L.L.C. El Paso CGP Company, L.L.C. is 100% owned by its parent corporation, El Paso LLC. El Paso LLC is 100% owned by its parent corporation, El Paso Holdco LLC. El Paso Holdco LLC is 100% owned by its parent corporation, Kinder Morgan, Inc. Kinder Morgan, Inc. has no corporate parent and there are no publicly held corporations that own 10% or more of Kinder Morgan, Inc.'s stock.

Dated: November 15, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brent H. Allen", with a long horizontal flourish extending to the right.

Brent H. Allen (D.C. Bar #464934)

Admitted *pro hac vice*

Dawn A. Ellison (D.C. Bar #464296)

Admitted *pro hac vice*

Lesley Lawrence-Hammer (D.C. Bar #982196)

Admitted *pro hac vice*

James Layman (D.C. Bar #983202)

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*Attorneys for Defendant El Paso Merchant Energy-
Petroleum Company*

CERTIFICATE OF SERVICE

I certify that on November 15, 2013, a true and correct copy of this Corporate Disclosure Statement of El Paso Merchant Energy-Petroleum Company was electronically served on counsel of record via LexisNexis File & Serve and electronic mail.

A handwritten signature in black ink, appearing to read "D. M. A. M. S. M.", is written over a horizontal line.